

## NOTICE OF AMENDMENT

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 25, 1999

Mr. Charles Doubrava  
Senior Vice President, Transmission  
Natural Gas Pipeline Company of America  
701 East 22nd Street  
Lombard, IL 50148-5072

**CPF 27116M**

Dear Mr. Doubrava:

From June 2, 1997 to June 13, 1997, a representative of the Southern Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of Natural Gas Pipeline Company of America (NGPC) Districts 305, 306, 307, and 308 and your records in Arkansas.

As a result of a review of your operating and maintenance manual, the requirements for which are set forth in section 192.605(a), the following inadequate procedure was noted:

**§192.707 Line markers for mains and transmission lines.** [(a) and (b) listed below]

**(a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:**

**(1) At each crossing of a public road and railroad; and**

**(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.**

**(b) Exceptions for buried pipelines. Line markers are not required for the following pipelines:**

**(1) Mains and transmission lines located offshore, or at crossings of or under**

**waterways and other bodies of water.**

**(2) Mains in Class 3 or Class 4 locations where a damage prevention program is in effect under §192.614.**

**(3) Transmission lines in Class 3 or 4 locations until March 20, 1996.**

**(4) Transmission lines in Class 3 or 4 locations where placement of a line marker is impractical.**

NGPL's Operating and Maintenance Manual Procedure 205 Pipeline Markers and Cover (1/97) states "If placement is impractical or a program exists to prevent interference with underground facilities (such as "one-call") signs are not required." §192.707 does not allow for an exception to mark buried transmission lines in class 3 or 4 locations where a program exists to prevent interference with underground facilities.

As provided in 49 C.F.R §190.237, this notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R §190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans are adequate. The criteria used in making this determination are outlined in 49 C.F.R §190.237. If you do not wish to contest this notice, please provide your revised procedures within 45 days of receipt of this notice. (See enclosure to this notice.)

Should you have any questions regarding this notice of amendment please make reference to CPF 27116M.

Sincerely,

Frederick A. Joyner  
Director, Southern Region  
Office of Pipeline Safety

Encl  
cc: Compliance Registry, OPS Headquarters

**Notice of Amendment**

You are to amend the procedure manual required by 192.605(a) as follows:

Revise your pipeline marking procedures to remove the exception that allows class 3 and 4 pipelines not to be marked with signs if a program exists to prevent interference with underground facilities (such as “one-call”).

Upon completion of the procedure please send a copy to this office for review and approval within 45 days of the receipt of this letter.